



March 27, 2015

Bob Dundas
Bridger Pipeline, LLC
PO Drawer 2360
Casper, WY 82602

Re: DEQ comments on the March 26, 2015 *Poplar Pipeline Response, Glendive, MT, Sediment and Co-located Water Sampling Work Plan and Schedule, Revision 1*

Dear Mr. Dundas:

The Montana Department of Environmental Quality (DEQ) has reviewed the March 26, 2015 *Poplar Pipeline Response, Glendive, MT, Sediment and Co-located Water Sampling Work Plan and Schedule, Revision 1*. Thank you for revising the work plan. The purpose of this letter is to provide comments to Bridger Pipeline, LLC (Bridger) on the revised work plan. The comments DEQ is providing in this letter are predominantly to address the changing oil and river conditions that are being encountered during the Phase III Shoreline Assessment.

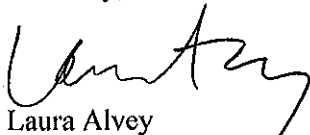
1. According to an email update from DEQ's Larry Alheim on March 27, 2015, recoverable oil has been found north of the I-94 bridge, and cleanup will be conducted. DEQ requires confirmation sampling following cleanup of this area, and any area where cleanup is conducted. DEQ requires confirmation sampling of soil (if applicable), sediment, and surface water to verify that each of these media meets applicable standards and screening levels following cleanup. If any of the samples collected might be considered to be "soil" (i.e., areas along the river bank and not generally submerged under river water) then the results must be compared to DEQ's Tier I Risk-Based Screening Levels. DEQ generally requires at least one 5-point composite sample for each 25 x 25 foot area that remains after cleanup, and professional judgment may dictate the collection of additional samples. Please add a section to the work plan that describes confirmation sampling of each media.
2. As DEQ previously commented, not all sediment sampling locations are going to be captured in the initial round of sediment sampling. In fact, most sediment sampling that is based upon visible oiling, sheen, and citizen concerns (for example, if a farmer is concerned about an irrigation intake) will likely occur later, during the sediment probing activity and oil reconnaissance. DEQ may require additional future sediment sampling based upon additional information or citizen complaints.
3. Photographs and first-hand accounts from the Shoreline Assessment indicate that some oil is being found on the shores of the Yellowstone and also as sheens on the water. DEQ requires sampling of all oiled media in order to document "worst case" concentrations of oil in sediment and surface water. In some cases, these samples may be opportunistic rather than planned. Carefully document these worst-case samples as such. Early (pre-weathering) samples or sheen samples will provide valuable data that will be compared to later (post-weathering or post-flood) samples to document the process of natural attenuation. These worst-case samples will also

provide data that will help guide decisions regarding what oil can be left to naturally attenuate versus oil that requires cleanup. Please start conducting worst-case sampling immediately as opportunities arise. DEQ recognizes that this requirement means that personnel able to collect samples will need to be part of the Shoreline Assessment teams. Please add a section to the work plan that discusses pre-cleanup/pre-weathering/worst-case soil (if applicable), sediment, and surface water sampling. In Section 6.0, please indicate that opportunity sampling of "worst-case" oiling will begin immediately.

4. DEQ wishes to clarify its expectation that water samples must be collected concurrently with sediment samples only when the sediment being sampled is under water. If sediment is collected from the shore above the water level, DEQ does not require a co-located water sample (since collection of a co-located water sample would be impossible). Similarly, there may be instances when a water sample is collected, but collection of a co-located sediment sample may not be possible. Please add language to the introduction of the work plan describing this concept.
5. Page 4, Section 5.0, 8th solid bullet: This bullet indicates that during the sediment sheen survey, if no sheen is observed, sediment samples will be collected "...every fifth sediment probing location." Depending on the number of samples this generates, DEQ may not require that every one of these samples be analyzed. Please also add to this bullet the following language: "At a minimum, one sediment sample and co-located water sample will be collected and analyzed each 10th of a river mile starting at the release site and continuing to the City of Glendive public water supply intake. From the City of Glendive water intake to Intake (the irrigation diversion structure), one sediment sample and co-located water sample will be collected approximately every half mile. The results of this sampling and the Shoreline Assessment results will inform the need to collect additional samples downstream (other than those already planned, for example at the Montana Dakota Utilities water intake)." If Bridger would like to propose a different frequency of sampling, please do so, with justification. By specifying the minimum number of samples that will be collected over segments of the river, DEQ intends to provide clearly defined expectations.

Please revise the work plan to incorporate all of DEQ's changes, but please do not make additional changes without consulting with me first. Please submit the revised work plan in modifiable electronic form and in hard copy by April 10, 2015. Please note that I will be out of the office from March 30 through April 3. However, I am planning to be on site in Glendive starting April 8, 2015, and will be able to discuss technical issues during that time. Please contact me if you have any questions at (406) 444-0212 or lalvey@mt.gov. If you would like to discuss the comments in this letter via telephone, please contact me on April 6 or 7, 2015.

Sincerely,



Laura Alvey
Environmental Science Specialist

cc:

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